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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)
)
Advanced Television Systems)
and Their Impact upon the) MM Docket No. 87-268
Existing Television Broadcast)
Service)
)

To: The Commission

OPPOSITION TO SUPPLEMENT TO PETITION FOR RECONSIDERATION

Paxon Communications Corporation ("PCC"), parent of the licensee of television station KWBF(TV), NTSC Channel 13, Flagstaff, Arizona, by its attorneys, and pursuant to 47 C.F.R. § 1.429(f), hereby opposes the Supplement to Petition for Reconsideration ("Supplement") of the *Sixth Report and Order* in MM Docket No. 87-268, FCC 97-115 (released April 21, 1997) ("*Sixth R&O*"), filed August 22, 1997, by KM Communications, Inc. ("KM"), permittee for station KCFG(TV), Flagstaff, Arizona. KM proposes that the Commission modify its DTV Table of Allotments and assign a different DTV channel to KCFG(TV), or, in the alternative, reassign KWBF(TV)'s DTV channel. PCC supports the Commission's efforts to implement digital television ("DTV") and bring this new television service to the American public as quickly as possible. Consistent with this, PCC believes that broadcasters can and should identify instances in the Commission's DTV Table of Allotments where improvements can be made. Such requests, however, must not result in new interference to other broadcasters, and, accordingly, PCC opposes the specific proposal found in KM's supplement to reassign KWBF(TV)'s DTV channel.

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KCFG(TV) was assigned DTV Channel 28 in the *Sixth R&O*, but it requests that the station's DTV channel be reassigned due to concerns of adjacent channel interference with KWBF(TV)'s DTV Channel 27. KM proposes in the alternative that KWBF(TV) be reassigned to DTV Channel 32. PCC does not oppose the efforts of KM to remedy these circumstances where it seeks, as in its initial request, an available channel for itself that meets the Commission's standard of "no new interference." However, KM's alternative proposal to reassign KWBF(TV)'s DTV channel does not meet that standard.

PCC's analysis of KM's alternate proposal to relocate KWBF(TV) to DTV Channel 32 indicates that the move would create new interference to PCC's station. As shown in the supporting exhibit ("Attachment A"), KM's proposal would result in predicted new interference to a population of 9,000. The Commission's initial DTV allotment to KWBF(TV) is predicted to result in *no* new interference. Because of the new interference that would be caused by the proposal, KM cannot meet the Commission's required standard for modifications to the DTV Table.

Additionally, KM's supplement generally contemplates the first request to reassign its own DTV channel and not the alternative request to reassign that of PCC's. Consequently, KM produces no technical showing that demonstrates the viability of its alternate proposal, making it difficult for PCC to comment in a meaningful fashion on merits of KM's request.

Because KM's alternative request to reassign KWBF(TV)'s DTV allotment is predicted to generate new interference and because the support for this alternative request is less than sufficient, PCC urges that the Commission reject this specific request of KM.

Respectfully submitted,

PAXSON COMMUNICATIONS CORPORATION

By: John R. Feore, Jr. / SSP
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Dated: September 23, 1997

ATTACHMENT A

Technical Exhibit

KWBF INTERFERENCE STUDY

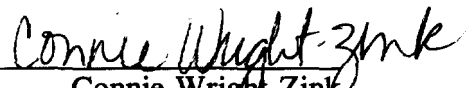
		CURRENT	PROPOSED
		Allocation DTV Ch. 27	Allocation DTV Ch. 32
Interference Received:			
NTSC	Area	0 sq. km.	0 sq. km.
	Pop.	0	0
	H.H.	0	0
DTV	Area	0 sq. km.	306 sq. km.
	Pop.	0	9,000
	H.H.	0	4,000
Interference Caused:			
	Area	480 sq. km.	370 sq. km.
	Pop.	0	7,000
	H.H.	0	2,000

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Opposition of Paxson Communications Corporation was sent by first-class mail, postage prepaid, this 23rd day of September, 1997, to each of the following:

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